

I am a 52 year old with over 30 years experience as a broadcaster. I am also an ASCAP music writer and music producer. I have been a fan of radio since I was a child. I believe it to be the most powerful media tool that Americans have. It is immediate, ubiquitous, and in its glory days, the best at serving the needs of the people within the coverage area of the community the local stations served. I have worked with many dedicated professionals who made it their mission to connect with the people they live among and communicate with in the course of their life's work. Sadly, many of them are out of work today due to the consolidation of the industry. Many of those of us who are lucky enough to have jobs are circumscribed in how we do our jobs due to niche marketing within clusters and national programming.

The FCC should allow market forces to determine what is local programming. Nothing gets broadcasters involved in the community like being a member of it and good old fashioned competition. In a free market, the stations that do the best job of serving the community are the ones which listeners will form a bond and emotional connection with. This is very hard to achieve when playlists, promotions, programming and even shows are being generated by people in other markets whose job it is, is to program the most stations with the fewest resources. All you get is quantity, and very little quality. You cannot regulate quality service to a community. The listeners will respond to the stations that serve their needs.

I would not be in favor of the nature of local programming being defined by the government. As much as I dislike government interference with the nature and content of programming, given the dire consequences that deregulation has had on radio, I fear that the time may have come to mandate that a large percentage of programming actually BE local, not voice tracked or syndicated.

Don't try to micromanage what form local programming should take. If you want radio to serve the people, as it should, rather than serving a few monolithic corporations, as it does, then throw out the communications act of 1996. Roll back the ownership rules to 7, 7, and 7...maximum. Those were the days when radio was great. There were lots of places to work, lots more people working, all trying their hardest to make a genuine connection with the citizens in the community. That will make the whole conversation about how much programming should be local and what constitutes local programming, moot.

Stations should not be required to participate in local activities. If stations are truly local, they will compete with each other and get involved in the community, or they will fail, as they should. People are smart enough to know who is speaking to them, has their interests at heart, and is involved with their lives. You cannot legislate that. You can require a certain number of hours of this or that, but unless stations are competing for listeners on a level playing field, the response will be perfunctory, poorly done programming. Let the market decide what it wants.

I've been in radio for over 30 years in the production end of things, so I have never had any personal experience with or knowledge of payola. It should remain illegal. Music should not make it on the air because someone can buy its way there. Pay for play is a bad idea too. Innovation and quality of product should determine how music gets exposed. An artist playing a station concert or a charity event is good innovative promotion and should not be prohibited. It should be encouraged. It is an opportunity for listeners to connect with an artist apart from hearing their single

played over and over. Listeners love that kind of thing. It serves their interests. If more bands were willing to do these things the listeners would reap the benefits.

Voice tracking is the scourge of radio. The only people it serves are the very rich, mega corporations. It sure doesn't do anything good for the listeners or the quality of radio. It cheapens it. Pretty soon there will be one broadcaster on the air 24 hours a day at every radio station in America. O.K. that may be one of those exaggerations, but you get what I mean. Don't outlaw it, but make stations reveal that the programming is not of local origination. Better yet, repeal the current ownership rules. If no company owns 400 stations, there won't be much of a market for voice tracking. Deregulation has ruined radio. Even in a small, four station cluster like the one I work in, we feel the restrictions of not competing with our sister stations. The programming suffers for it and the listeners lose.

National playlists disserve the public just like voice tracking. The only way to get rid of it is to get rid of national corporations programming hundreds of stations. Localism is stifled and local artists suffer. Music is researched to death and playlists get smaller and smaller. If there is no local DJ or music director going to clubs, listening to tapes and being exposed to local music, how will it ever be heard by some guy in New York? It won't and thus will never be heard by the public anywhere.

I think LPFMs are too small to have much of an impact. Nice idea, but with few exceptions, they will likely be little more than isolated background noise. Stations can only be effective when they serve a market, not a few blocks within a market. Nice idea though. I wish I could be more optimistic about them.

Thank you for taking the time to allowing me to voice my concerns. I don't want to live in the past, but I do feel that radio has taken a tragic turn for the worse in the past 8 years and I would love to see the kind of competition and community spirit that radio used to have return.